

# EXHIBIT 16

**KASEY LIBBY**  
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April 18, 2023

*Via Email to SMapes@lgamerica.com*

Susan Mapes, Claims Department  
Banner Life Insurance Company  
3275 Bennett Creek Avenue  
Frederick, MD 21704

**Re: Angelo E. Belvin – Policy No. 181271893**

Dear Ms. Mapes:

Since the death of Angelo E. Belvin on March 31, 2023, I understand Rose Gayle Stewart, a potentially competing claimant of the proceeds of the above-referenced policy owned by Mr. Belvin (“the Policy”), has sent a letter to Banner Life Insurance Company in which she admitted the beneficiary change form submitted in connection with the Policy that named her sole beneficiary of the policy proceeds, which I understand was submitted in January 2023, is not valid, and in which she waived her rights to collect on the entirety of the policy proceeds based on such invalid beneficiary change request. As evidence of the invalidity of the request, Ms. Stewart had prepared and executed a document in which she declared that, as of October 1, 2022, Mr. Belvin was no longer able to make sound decisions. I understand Ms. Stewart referenced that document in her letter to you. A copy of the document is enclosed with this letter.

I believe Ms. Stewart also may have executed a hold harmless agreement and provided it to Banner Life. However, I would expect Banner Life would prefer that Ms. Stewart execute a similar agreement, indemnity agreement and/or release of claims that has been prepared by Banner Life rather than a third party and ask that Banner Life’s legal department review her letter and prepare such agreement for Ms. Stewart to sign so that all parties can avoid court intervention in this matter through an interpleader action.

I hope all parties will be able to resolve this matter out of court. If you have any questions, please feel free to call me.

Sincerely,



Kasey Libby

Enclosures

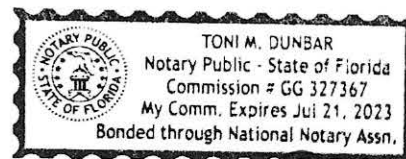
REDACTED

**Declaration of Trust for Angelo Belvin, statement added to section named Part 8 Incapacity of Grantor:**

I Rose Gayle Stewart, do hereby acknowledge that Angelo Belvin, born [REDACTED] 1964 is/was not able to make sound decisions as of October 1, 2022. I worked with my niece, Von Davis, whom was POA, listed a primary in his Declaration of Trust and now serves as Executor of the Estate named in the Will of Angelo Belvin. It is my opinion that as of October 1 2022, Angelo Belvin is/was not able to sign or update any legal document due to his medical diagnosis of [REDACTED] diagnosis. Additional evidence is shown in the medical records by the treating physical Dr. Eddie Zhang, Radiation Oncology (678-843-7004) to support this statement. Any legal documents signed by Angelo Belvin after October 1, 2022 until his date of death, **March 31, 2023** are invalid.

Rose Gayle Stewart,

Signature:

*Rose G. Stewart*STATE OF FLORIDA COUNTY OF Manatee The foregoing instrument wasacknowledged before me this 3<sup>rd</sup> day of 2023, by (name of person acknowledging)Rose G. StewartToni M. Dunbar - Acknowledging Notary  
(Seal) Signature of Notary Public Print, Type/Stamp Name ofNotary Personally known: \_\_\_\_\_ OR Produced Identification: ☒ Type ofIdentification Produced: FLDL

4/03/2023

*Toni M. Dunbar*